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13 REED, and COASTAL PROTECTION  
RANGERS, INC.  
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15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
17

18 CORY SPENCER, an individual;  
19 DIANA MILENA REED, an  
individual; and COASTAL  
20 PROTECTION RANGERS, INC., a  
California non-profit public benefit  
21 corporation,

22 Plaintiffs,  
23

24 v.

25 LUNADA BAY BOYS; THE  
26 INDIVIDUAL MEMBERS OF THE  
LUNADA BAY BOYS, including but  
27 not limited to SANG LEE, BRANT  
28 BLAKEMAN, ALAN JOHNSTON

CASE NO. 2:16-cv-02129-SJO (RAOx)

Hon. Rozella A. Oliver

**NOTICE OF MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS**

**[Filed concurrently With: Joint  
Stipulation Regarding Plaintiffs'  
Motion to Compel Production of  
Documents; Declaration of Victor  
Otten]**

Hearing Date: December 7, 2016  
Hearing Time: 10:00 a.m.  
Location: Courtroom F, 9<sup>th</sup> Floor

Discovery Cutoff: August 7, 2017  
Pretrial Conference: October 23, 2017  
Trial: November 7, 2017

1 AKA JALIAN JOHNSTON,  
2 MICHAEL RAE PAPAYANS,  
3 ANGELO FERRARA, FRANK  
4 FERRARA, CHARLIE FERRARA,  
5 and N.F.; CITY OF PALOS  
6 VERDES ESTATES; CHIEF OF  
7 POLICE JEFF KEPLEY, in his  
8 representative capacity; and DOES  
9 1-10,

Defendants.

11 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

12 PLEASE TAKE NOTICE that on at 10:00 a.m., in the courtroom of the  
13 Honorable Rozella A. Oliver, located at 312 North Spring Street, Los  
14 Angeles, California, 90012, in Courtroom F, 9<sup>th</sup> floor, Plaintiff Cory Spencer,  
15 Diana Milena Reed, and Coastal Protection Rangers will and hereby does  
16 move pursuant to Fed. R. Civ. P. 37(a) for an order compelling Defendant  
17 Alan Johnston aka Julian Johnston to permit inspection by Plaintiffs of  
18 documents and electronically stored information. Plaintiffs further request  
19 that this Court order Mr. Johnston and his attorney to pay Plaintiffs'  
20 counsel's fees and costs incurred because of his refusal to respond to  
21 Plaintiffs' document requests. There is no justification for his failure to  
22 produce any documents in response to Plaintiffs' requests. Accordingly,  
23 Plaintiffs are entitled to recover their reasonable expenses. Fed. R. Civ. P.  
24 37(a)(5).

25 Prior to filing this Motion, the parties have met and conferred pursuant  
26 to L. R. 37-1, and made a good faith attempt to resolve this dispute but were  
27 unable to do so.

28 This Motion to Compel is based upon this Notice, the concurrently filed



1 Joint Stipulation Regarding Plaintiff's Motion to Compel documents, the  
2 declaration of Victor Otten attached as **Exhibit 1** to the Joint Stipulation, the  
3 pleadings and records on file in this action and such other matters as the  
4 Court deems necessary and proper.

5  
6 DATED: November 15, 2016

HANSON BRIDGETT LLP

7  
8 Bv: /s/ Kurt A. Franklin

9 KURT A. FRANKLIN  
10 SAMANTHA D. WOLFF  
11 CAROLINE ELIZABETH LEE  
12 TYSON M. SHOWER  
13 LONDON D. BAILEY  
Attorneys for Plaintiffs  
CORY SPENCER, DIANA MILENA  
REED, and COASTAL PROTECTION  
RANGERS, INC.

14 DATED: November 15, 2016

OTTEN LAW, PC

15  
16  
17 Bv: /s/ Victor Otten

18 VICTOR OTTEN  
19 KAVITA TEKCHANDANI  
Attorneys for Plaintiffs  
CORY SPENCER, DIANA MILENA  
REED, and COASTAL PROTECTION  
RANGERS, INC.  
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PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party of this action. I am employed in the county of Los Angeles, State of California. My business Address is 20550 Earl Street, #200, Torrance CA 90503.

On November 15, 2016, I served true copies of the following document(s)  
Described as NOTICE OF MOTION on the interested parties in this action as follows:

J. Patrick Carey, Esq.

Peter Haven, Esq.

LAW OFFICES OF J. PATRICK CAREY

HAVEN LAW

1230 Rosecrans Avenue, Suite 300

1230 Rosecrans Avenue, Suite 300

Manhattan Beach, CA 90266

Manhattan Beach, CA 90266

X        BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with J Patrick Carey's practice for collecting and processing correspondence for mailing. On the same day that correspondence is places for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

X BY PERSONAL SERVICE: I caused such envelope to be delivered to a commercial messenger service with instructions to personally deliver same to the offices of the addressee on this date.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

Executed on November 15, 2016 at Torrance, California.

  
Keith Weaver



PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party of this action. I am employed in the county of Los Angeles, State of California. My business Address is 3620 Pacific Coast Highway, Suite 100, Torrance CA 90505.

On November 15, 2016, I served true copies of the following document(s)  
Described as **NOTICE OF MOTION** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

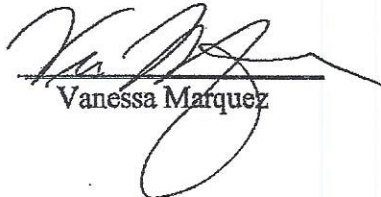
☒ BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Hanson Bridgett LLP's practice for collecting and processing correspondence for mailing. On the same day that correspondence is places for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

☐ BY PERSONAL SERVICE: I caused such envelope to be delivered to a commercial messenger service with instructions to personally deliver same to the offices of the addressee on this date.

☐ BY EMAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent form e-mail address \_\_\_\_\_ to the personas at the email addresses listed in the Service List. The document(s) were transmitted at approximately 8:00 p.m. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

Executed on November 15, 2016, at Torrance, California.

  
Vanessa Marquez

PROOF OF SERVICE

**List of Counsel in *Spencer, et al. v. Lunada Bay Boys, et al.***  
**U.S.D.C. for the Central District of California, Western Division**  
**Case #:2:16-cv-02129-SJO (RAOx)**

<p><b>Plaintiffs CORY SPENCER, DIANA MITLENA REED, and COASTAL PROTECTION RANGERS, INC.</b></p>	<p>Kurt A. Franklin, Esq.  Samantha Wolff, Esq.  Caroline Lee, Esq.  HANSON BRIDGETT LLP  425 Market Street, 26th Floor  San Francisco, CA 94105  Telephone: (415) 777-3200  Facsimile: (415) 541-9366</p> <p>Tyson M. Shower, Esq.  Landon Bailey, Esq.  HANSON BRIDGETT LLP  500 Capitol Mall, Suite 1500  Sacramento, CA 95814  Telephone: (916) 442-3333  Facsimile: (916) 442-2348</p> <p>Victor Otten, Esq.  Kavita Tekchandani, Esq.  OTTEN LAW, PC  3620 Pacific Coast Highway, #100  Torrance, CA 90505  Telephone: (310) 378-8533  Facsimile: (310) 347-4225</p>	<p>kfranklin@hansonbridgett.com  swolff@hansonbridgett.com  clec@hansonbridgett.com</p> <p>tshower@hansonbridgett.com  lbailey@hansonbridgett.com</p> <p>vic@ottenlawpc.com  kavita@ottenlawpc.com</p>
<p><b>Defendant LUNADA BAY BOYS</b></p>		



*List of Counsel in Spencer, et al. v. Lunada Bay Boys, et al.*  
U.S.D.C. for the Central District of California, Western Division  
Case #2:16-cv-02129-SJO (RAOx)

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**U.S.D.C. for the Central District of California, Western Division**  
**Case #2:16-cv-02129-SJO (RAOx)**

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**List of Counsel in *Spencer, et al. v. Lunada Bay Boys, et al.***  
**U.S.D.C. for the Central District of California, Western Division**  
**Case #2:16-cv-02129-SJO (RAOx)**

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